

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

|                           |   |                         |
|---------------------------|---|-------------------------|
| In re:                    | ) | Chapter 11              |
|                           | ) |                         |
| W. R. GRACE & CO., et al. | ) | Case No. 01-01139 (JKF) |
|                           | ) | (Jointly Administered)  |
| Debtors.                  | ) |                         |

**DEBTORS' MOTION FOR EXPEDITED CONSIDERATION OF AGREED  
MOTION FOR ENTRY OF AN ORDER CONFIRMING THAT DEPOSITION  
TESTIMONY OF DR. PHILIP H. LUCAS IS NOT WITHIN THE SCOPE OF THE  
HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT**

Debtors hereby request that the Court consider the Agreed Motion for Entry of an Order Confirming that Deposition Testimony of Dr. Philip H. Lucas is not within the Scope of the Health Insurance Portability and Accountability Act filed February 8, 2007 (the "Motion") on an expedited basis and rule on the Motion without the need for any hearing.

Expedited consideration and resolution of the Motion is warranted because the Motion is an agreed Motion between the Debtors and Dr. Lucas. Moreover, prompt resolution of the Motion is necessary to ensure that the deposition of Dr. Lucas is taken in a timely manner and in accordance with the dates contained in the Case Management Order for the Estimation of Asbestos Personal Injury Liabilities.

WHEREFORE, W.R. Grace & Co. respectfully requests that the Court grant this motion for expedited consideration and rule on and approve the motion at the Court's earliest convenience.

Dated: February 8, 2007

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